INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

February 20, 2004

TO: Interested Parties / Applicant

RE: MasterBrand Cabinets, Inc. / 037-5930-00051

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).
For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:
(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:
(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and

(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 9/16/03

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www.state.in.us/idem

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

MasterBrand Cabinets, Inc. - Ferdinand Operations
614 West Third Street
Ferdinand, Indiana 47532

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T037-5930-00051

Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: Expiration Date:

TABLE OF CONTENTS

TABLE OF CONTENTS (Continued)

TABLE OF CONTENTS (Continued)

TABLE OF CONTENTS (Continued)

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary woodworking and surface coating operation manufacturing kitchen and bath cabinets.

Responsible Official:	Vice President Stock Operations
Source Address:	614 West Third Street, Ferdinand, Indiana 47532
Mailing Address:	One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
General Source Phone Number:	(812) 482-2527
SIC Code:	2434
County Location:	Dubois
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This woodworking and surface coating company consists of two (2) plants:

(a) Plant 4 is located at 614 West Third Street, Ferdinand, Indiana 47532; and

(b) Plant 22 is located at 624 West Third Street, Ferdinand, Indiana 47532.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and are under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) conventional surface coating line, constructed in 1973, comprised of the following surface coating facilities:

(1) One (1) toner booth, identified as TB-12, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack T4;

(2) One (1) stain booth, identified as STB-13, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack ST4;

(3) One (1) sealer booth, identified as SB-14, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks S3 and S4;

(4) One (1) top coat booth, identified as TCB-15, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks TC4 and TC5; and

(5) Two (2) parts booths, identified as PB-16 and PB-17, with a maximum capacity of 225 units per hour, each with particulate emissions controlled by a dry filter, and exhausting through stacks P1, P2, and P3.

(6) One (1) natural gas-fired oven identified as Ou-5, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack O1.

(b) One (1) electrostatic finishing line, comprised of the following facilities:

(1) One (1) toner spray booth, identified as TB-2, constructed in 1985, with a maximum capacity of 766 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks T1 and T2;

(2) Two (2) stain spray booths using electrostatic spray applicators, identified as STB-3 and STB-4, both constructed in 1985, each with a maximum capacity of 766 units per hour, each with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(3) Two (2) sealer spray booths using electrostatic spray applicators, identified as SB-7 and SB-8, both constructed in 1985, each with a maximum capacity of 766 units per hour, each with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(4) Two (2) topcoat spray booths using electrostatic spray applicators, identified as TCB-9 and TCB-10, both constructed in 1985, each with a maximum capacity of 766 units per hour, with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(5) One (1) sealer touchup spray booth, identified as SB-6, constructed in 1989, with particulate emissions controlled by a dry filter, and exhausting through stack S3;

(6) One (1) topcoat touchup spray booth, identified as TCB-18, constructed in 1993, with particulate emissions controlled by a dry filter, and exhausting through stack TC3; and

(7) One (1) natural gas-fired curing oven, identified as Ou-11, constructed prior to 1985, with a maximum capacity of 2 million British thermal units per hour (MMBtu/hr), and exhausting to stacks O2 and O3.

(c) Woodworking equipment controlled by baghouses, including:

(1) One (1) woodworking cell, identified as MC-2, constructed in 1968, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-1;

(2) One (1) woodworking cell, identified as MC-3, constructed in 1998, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-2;

(3) One (1) woodworking cell, identified as MC-5, constructed in 1997, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-4;

(4) One (1) woodworking cell, identified as MC-6, constructed in 1986, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-5; and

(5) One (1) woodworking cell, identified as MC-7, constructed in 1986, controlled by a 48,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-6.

(d) Woodworking equipment controlled by baghouses including:

(1) One (1) woodworking cell, identified as MC-1, constructed in 1968, controlled by a 33,000 cubic feet per minute baghouse, and exhausting either internally or to stacks MU1, MU2, MU3, MU4, MU5, and MU6; and

(2) One (1) woodworking cell, identified as MC-4, constructed in 1968, controlled by a 35,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-3.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):

(a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(b) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) natural gas-fired oven, identified as Ou23, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting at stack O4. [326 IAC 6-1-2]

(2) One (1) topcoat storage tank with a capacity of 3,000 gallons; and

(3) One (1) sealer storage tank with a capacity of 3,000 gallons.

(c) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.

(d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(e) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(f) Two (2) spray booths, identified as STB-19 and STB-20, each constructed in 2003, each with particulate emissions controlled by a dry filter, and exhausting through stacks ST5 and ST6. [326 IAC 6-1-2]

(g) Three (3) end coat booths, identified as ECB-1, ECB-2, and ECB-3, each constructed in 1994, each with particulate emissions controlled by a dry filter, and exhausting through stacks EC1, EC2, and EC3, respectively [326 IAC 6-1-2].

(h) One (1) UV Stickline, identified as UVC-31, constructed in 1999, and exhausting internally;

(i) One (1) UV Flatline, identified as UVC-30, constructed in 1994, and exhausting internally;

(j) One (1) UV Stickline, identified as UVC-29, constructed in 1994, and exhausting internally;

(k) One (1) UV cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-26, constructed in 1994, exhausting to stack UV6/7;

(l) One (1) UV coating line, identified as UVC27 and constructed in 2003, with a maximum operating capacity of 2,170 square feet per hour, using a UV spray coating application method.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Southwest Regional Office
Telephone Number: 1-888-672-8323 or 812-436-2570
Facsimile Number: 812-436-2572

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance

Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13–17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 1-7-2, IAC 1-7-3(c) and (d), 326 IAC 1-7-4,and 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Abestos is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) days compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on March 12, 1999.

(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan ; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Conventional Surface Coating Line and Electrostatic Finishing Line

(a) One (1) conventional surface coating line, constructed in 1973, comprised of the following surface coating facilities:

(1) One (1) toner booth, identified as TB-12, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack T4;

(2) One (1) stain booth, identified as STB-13, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack ST4;

(3) One (1) sealer booth, identified as SB-14, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks S3 and S4;

(4) One (1) top coat booth, identified as TCB-15, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks TC4 and TC5; and

(5) Two (2) parts booths, identified as PB-16 and PB-17, with a maximum capacity of 225 units per hour, each with particulate emissions controlled by a dry filter, and exhausting through stacks P1, P2, and P3.

(6) One (1) natural gas-fired oven identified as Ou-5, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack O1.

(b) One (1) electrostatic finishing line, comprised of the following facilities:

(1) One (1) toner spray booth, identified as TB-2, constructed in 1985, with a maximum capacity of 766 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks T1 and T2;

(2) Two (2) stain spray booths using electrostatic spray applicators, identified as STB-3 and STB-4, both constructed in 1985, each with a maximum capacity of 766 units per hour, each with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(3) Two (2) sealer spray booths using electrostatic spray applicators, identified as SB-7 and SB-8, both constructed in 1985, each with a maximum capacity of 766 units per hour, each with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(4) Two (2) topcoat spray booths using electrostatic spray applicators, identified as TCB-9 and TCB-10, both constructed in 1985, each with a maximum capacity of 766 units per hour, with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(5) One (1) sealer touchup spray booth, identified as SB-6, constructed in 1989, with particulate emissions controlled by a dry filter, and exhausting through stack S3;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Conventional Surface Coating Line and Electrostatic Finishing Line (Continued)

(6) One (1) topcoat touchup spray booth, identified as TCB-18, constructed in 1993, with particulate emissions controlled by a dry filter, and exhausting through stack TC3; and

(7) One (1) natural gas-fired curing oven, identified as Ou-11, constructed prior to 1985, with a maximum capacity of 2 million British thermal units per hour (MMBtu/hr), and exhausting to stacks O2 and O3.

(c) One (1) natural gas-fired oven, identified as Ou23, with a maximum heat input capacity of 1 MMBtu units per hour, and exhausting at stack 04.

Insignificant Activities:

(d) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) topcoat storage tank with a capacity of 3,000 gallons; and

(2) One (1) sealer storage tank with a capacity of 3,000 gallons.

(e) Two (2) spray booths, identified as STB-19 and STB-20, each constructed in 2003, each with particulate emissions controlled by a dry filter, and exhausting through stacks ST5 and ST6. [326 IAC 6-1-2]

(f) Three (3) end coat booths, identified as ECB-1, ECB-2, and ECB-3, each constructed in 1994, each with particulate emissions controlled by a dry filter, and exhausting through stacks EC1, EC2, and EC3, respectively.

(g) One (1) UV Stickline, identified as UVC-31, constructed in 1999, and exhausting internally;

(h) One (1) UV Flatline, identified as UVC-30, constructed in 1994, and exhausting internally;

(i) One (1) UV Stickline, identified as UVC-29, constructed in 1994, and exhausting internally;

(j) One (1) UV cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-26, constructed in 1994, exhausting to stack UV6/7;

(k) One (1) UV coating line, identified as UVC27 and constructed in 2003, with a maximum operating capacity of 2,170 square feet per hour, using a UV spray coating application method.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply, to the conventional surface coating line, the electrostatic finishing line, the end coat booths (ECB-1, ECB-2, ECB-3), the UV Sticklines (WC-31) and UVC-29), the UV Flatline (UVC-30), the UV cured vacuum coater booth (UVC-26), and the UV coating line (UVC-27), except when otherwise specified in 40 CFR 63, Subpart JJ.

D.1.2 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR Part 63, Subpart JJ]

(a) The wood furniture coating operations are subject to 40 CFR Part 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14-1, with a compliance date of November 21, 1997.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(c) If the Permittee elects to comply using 40 CFR 63.804(d)(3) or 63.804(e)(2), monitoring shall be conducted in accordance with 40 CFR 63.804(g)(4)(i),(ii)(A), and (iv) and 63.804(g)(6)(i), (ii)(A), and (iv).

D.1.3 Work Practice Standards [326 IAC 20] [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

D.1.4 Best Available Control Technology (BACT) [326 IAC 2-2-3] [326 IAC 8-1-6]

(a) Pursuant to SSM037-13893-00051, issued February 3, 2003, 326 IAC 2-2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the Permittee shall install and operate a regenerative thermal oxidizer (RTO) to control the VOC emissions from the stain booths (STB-3 and STB-4), sealer booths (SB-7 and SB-8), and topcoat booths (TCB-9 and TCB-10).

(b) Pursuant to SSM037-13893-00051, issued February 3, 2003, 326 IAC 2-2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the input VOC shall be limited as follows:

(1) Stain Booths (STB-3 and STB-4), Sealer Booths (SB-7 and SB-8), and Topcoat Booths (TCB-9 and TCB-10)

The input of VOC shall be limited such that, in conjunction with the use of the regenerative thermal oxidizer, the VOC emissions shall not exceed two hundred (200) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) Toner Booth (TB-2) and Touchup Booths (SB-6 and TCB-18)

The input of VOC shall not exceed one hundred nineteen (119) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.1.5 Transition Period BACT [326 IAC 2-2-3] [40 CFR 52.21] [326 IAC 8-1-6]

(a) Pursuant to SSM037-13893-00051, issued February 3, 2002, during the time period from the date of commencement of operation of the RTO, October 31, 2003, up to twelve (12) months of operation, the input of VOC to the stain (STB-3 and STB-4), sealer (SB-7 and SB-8), and topcoat (TCB-9 and TCB-10) booths shall be limited, such that in conjunction

with the operation of the RTO, the VOC emissions shall not exceed two hundred (200) tons per year. This limit shall be implemented as follows:

(1) For the period of the first quarter (period of three (3) calendar months) from the date of commencement of operation of the RTO, October 31, 2003 to January 31, 2004, the input of VOC to the stain (STB-3 and STB-4), sealer (SB-7 and SB-8), and topcoat (TCB-9 and TCB-10) booths shall be limited such that, in conjunction with the operation of the RTO, the VOC emissions shall not exceed fifty (50) tons per quarter.

(2) For the subsequent months up to October 31, 2004, the input of VOCs to the stain (STB-3 and STB-4), sealer (SB-7 and SB-8), and topcoat (TCB-9 and TCB-10) booths shall be limited such that, in conjunction with the operation of the RTO, the total VOC emissions divided by the accumulated months of operation from the date of commencement of operation of the RTO shall not exceed 16.67 tons per month.

D.1.6 Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from the conventional surface coating line (TB-12, STB-13, SB-14, TCB-15, PB-16, and PB-17), the electrostatic finishing line (TB-2, STB-3, STB-4, SB-7, SB-8, TCB-9, TCB-10, SB-6, and TCB-18), the end coat booths (ECB-1, ECB-2, and ECB-3), the UV Sticklines (UVC-31 and UVC-29), the UV Flatline (UVC-30), the cured vacuum coater booth (UVC-26), the UV coating line (UVC-27), spray booths (STB-19 and STB-20), and the three (3) natural gas fired ovens (Ou5, Ou11, and Ou23), shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to SSM 037-13893-00051 and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets by the electrostatic finishing line (TB-2, STB-3, STB-4, SB-7, SB-8, TCB-9, TCB-10, SB-6, and TCB-18) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.9 Regenerative Thermal Oxidizer (RTO) [326 IAC 2-2-3] [326 IAC 8-1-6]

Pursuant to SSM037-13893-00051, issued February 3, 2003, 326 IAC 2-2-3 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the Permittee shall comply with the following requirements:

(a) The Permittee shall install and commence operation of a natural gas-fired regenerative thermal oxidizer (RTO) with a maximum heat input capacity of 7.9 million British thermal units per hour (MMBtu/hr) to control VOC emissions from the stain (STB-3 and STB-4), sealer (SB-7 and SB-8), and topcoat (TCB-9 and TCB-10) booths of the electrostatic finishing line, no later than October 31, 2003.

(b) The RTO shall operate at all times that the electrostatic finishing line is in operation to control VOC emission in order to comply with Conditions D.1.4 and D.1.5 and Condition D.1.2 if compliance is based on the use of add on control.

(c) The RTO shall operate with a capture efficiency of no less than fifty percent (50%) and a destruction efficiency of no less than ninety-five percent (95%).

(d) After the results of the performance test become available, as required by Condition D.1.11(a), the compliance demonstrations shall use the actual measured capture and control efficiencies.

D.1.10 Particulate Control

In order to comply with Condition D.1.6, the dry filters for particulate control shall be in operation and control emissions from the conventional surface coating line, the electrostatic finishing line, the end coat booths (ECB-1, ECB-2, ECB-3) and the two spray booths (STB-19 and STB-20) at all times that these lines are in operation.

D.1.11 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 20] [40 CFR 63, Subpart JJ]

(a) Pursuant to SSM037-13893-00051, issued February 3, 2003, within 60 sixty of achieving maximum production rate, but no later than 180 days after the installation of the regenerative thermal oxidizer, the Permittee shall perform VOC capture and destruction efficiency testing utilizing methods as approved by the Commissioner in order to demonstrate compliance with Conditions D.1.4 and D.1.9. Testing shall be conducted in accordance with Section C - Performance Testing.

(b) Pursuant to SSM037-13893-00051, issued February 3, 2003, the Permittee shall determine the hourly average temperature, minimum operating temperature, and duct pressure or fan amperage for the RTO from the most recent valid stack test that demonstrates compliance with the limits and efficiencies in Conditions D.1.4 and D.1.9 as approved by IDEM.

(c) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

D.1.12 Volatile Organic Compounds (VOC)

Pursuant to SSM037-13893-00051, issued February 3, 2003, compliance with Conditions D.1.4 and D.1.5 shall be based on the total organic compound emitted for the previous month and adding it to the previous 11 months total VOC emitted so as to arrive at the VOC emissions for 12 consecutive months period. The VOC emissions for a month, as required by Conditions D.1.4 and D.1.5, can be arrived at using the following equation for VOC usage:

VOC (tons) emitted = [(VOC (tons) input) x (100-% control efficiency of the RTO)]

+ [uncontrolled VOC (tons) input]

Where VOC input is based on the formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4. Control efficiency of the RTO can be calculated by multiplying the capture efficiency by the destruction efficiency.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.13 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the conventional surface coating booth stacks and the electrostatic finishing line stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.14 Regenerative Thermal Oxidizer (RTO)

Pursuant to SSM037-13893-00051, issued February 3, 2003, the Permittee shall comply with the following requirements:

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the RTO for measuring operating temperature when the electrostatic finishing line is in operation. The output of this system shall be recorded as continuous and hourly average readings. From the date of commencement of the RTO until the approved stack test results are available, the Permittee shall operate the RTO at or above the hourly average temperature of 1350 degrees Fahrenheit (^{o}F).

(b) The Permittee shall determine the hourly average temperature, minimum operating temperature, and duct pressure/fan amperage for the RTO from the most recent valid stack test that demonstrates compliance with limits and efficiencies in Condition D.1.4 and D.1.9, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall maintain:

(1) The hourly average temperature at or above the hourly average temperature as observed during the most recent compliant stack test.

(2) the continuous operating temperature at or above the minimum operating temperature as observed during the most recent compliant stack test.

(d) The duct pressure/fan amperage shall be observed at least once per day when the RTO is on operation. On and after the date of the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.15 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(b) To document compliance with Condition D.1.3, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(c) To document compliance with Conditions D.1.4 and D.1.5, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.4 and D.1.5.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month;

(6) The weight of VOCs emitted for each compliance period;

(7) The continuous records of hourly average and minimum operating temperature for the RTO and the temperature used to demonstrate compliance during the most recent compliant stack test; and

(8) Daily records of the duct pressure or fan amperage.

(d) To document compliance with Condition D.1.13, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(e) To document compliance with Condition D.1.8, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.1.4 and D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.2 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

(1) For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(2) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(c) If the RTO is used to demonstrate compliance with 40 CFR 63, Subpart JJ, the excess emissions and continuous monitoring system performance report and summary report shall be submitted as required in 40 CFR 63.807(d). This report is not necessary if the RTO is not used to demonstrate compliance.

(d) The reports required in (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard

Chicago, Illinois 60604-3590

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Woodworking equipment controlled by baghouses including:

(1) One (1) woodworking cell, identified as MC-2, constructed in 1968, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-1;

(2) One (1) woodworking cell, identified as MC-3, constructed in 1998, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-2;

(3) One (1) woodworking cell, identified as MC-5, constructed in 1997, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-4;

(4) One (1) woodworking cell, identified as MC-6, constructed in 1986, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-5; and

(5) One (1) woodworking cell, identified as MC-7, constructed in 1986, controlled by a 48,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-6.

(b) Woodworking equipment controlled by baghouses including:

(1) One (1) woodworking cell, identified as MC-1, constructed in 1968, controlled by a 33,000 cubic feet per minute baghouse, and exhausting either internally or to stacks MU1, MU2, MU3, MU4, MU5, and MU6; and

(2) One (1) woodworking cell, identified as MC-4, constructed in 1968, controlled by a 35,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-3.

Insignificant Activities:

(a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate matter emissions from the woodworking cells MC-3, MC-5, MC-6, and MC-7 shall not exceed the following pound per hour limitations:

Facility	PM limit (lb/hr)	PM-10 limit (lb/hr)
MC-3	5.68	3.40
MC-5	5.68	3.40

MC-6 and MC-7	5.68	--

This emission limit is required to limit the potential to emit of PM to less than 25 tons and the potential to emit of PM-10 to less than 15 tons per twelve (12) consecutive month period and is a condition of operation of this facility. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.2 Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from the woodworking operations (MC-1, MC-2, MC-3, MC-4, MC-5, MC-6, and MC-7) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the baghouses controlling woodworking cells MC-2, MC-3, MC-5, MC-6, and MC-7.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

In order to comply with Conditions D.2.1 and D.2.2, the baghouses for PM and PM10 control shall be in operation and control emissions from the woodworking facilities (MC-3, MC-5, MC-6, and MC-7) at all times that the woodworking facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation (MC-3, MC-5, MC-6, and MC-7) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be repaired or replaced.

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust (MC-3, MC-5, MC-6, and MC-7) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response

steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, D.2.2 and D.2.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhausts when venting to the atmosphere.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.

(c) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
Part 70 Permit No.: T037-5930-00051

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

? Annual Compliance Certification Letter

? Test Result (specify) _____

? Report (specify) _____

? Notification (specify) _____

? Affidavit (specify) _____

? Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
Part 70 Permit No.: T037-5930-00051

This form consists of 2 pages **Page 1 of 2**

? This is an emergency as defined in 326 IAC 2-7-1(12)

- ? The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- ? The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
Part 70 Permit No.: T037-5930-00051
Facility: Electrostatic Finishing Line
Parameter: VOC usage for stain (STB-3, STB-4), sealer (SB-7, SB-8), topcoat (TCB-9, TCB-10)*
Limit: (a) Less than fifty (50) tons per quarter for the stain (STB-3, STB-4), sealer (SB-7, SB-8), and topcoat (TCB-9, TCB-10) booths

(b) Less than 119 tons per 12 consecutive month period with compliance determined at the end of each month for toner (TB-2) and touchup (SB-6, TCB-18) booths

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

***Records reflecting limits for the transitional period from the commencement of operation of the RTO to the end of the first quarter (period of three (3) calendar months).**

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
Part 70 Permit No.: T037-5930-00051
Facility: Electrostatic Finishing Line
Parameter: VOC usage for stain (STB-3, STB-4), sealer (SB-7, SB-8), topcoat (TCB-9, TCB-10)*
Limit: (a) Less than 16.67 tons per month for the stain (STB-3, STB-4), sealer (SB-7, SB-8), and topcoat (TCB-9, TCB-10) booths

(b) Less than 9.9 tons per month for toner (TB-2) and touchup (SB-6, TCB-18) booths

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

***Records reflecting limits for the transitional period starting from three (3) months following the commencement of operation of the RTO up to twelve (12) months from the commencement of operation.**

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
Part 70 Permit No.: T037-5930-00051
Facility: Electrostatic Finishing Line
Parameter: VOC usage for stain (STB-3, STB-4), sealer (SB-7, SB-8), topcoat (TCB-9, TCB-10)*
Limit: (a) Less than 200 tons per 12 consecutive month period with compliance determined at the end of each month for the stain (STB-3, STB-4), sealer (SB-7, SB-8), and topcoat (TCB-9, TCB-10) booths

(b) Less than 119 tons per 12 consecutive month period with compliance determined at the end of each month for toner (TB-2) and touchup (SB-6, TCB-18) booths

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

***Records reflecting limits following the transitional period twelve (12) months following the commencement of operations of the RTO.**

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
Semi-Annual Report

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
Part 70 Permit No.: T037-5930-00051
Facility: Surface Coating
Parameter: VOC and VHAPs - NESHAP
Limit:
(1) Finishing operations -1.0 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinner mixtures - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR:_____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

? No deviation occurred in this six month period.

? Deviation/s occurred in this six month period.

Deviation has been reported on:

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
Part 70 Permit No.: T037-5930-00051

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for Part 70 Operating Permit

Source Background and Description

Source Name:	MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Location:	614 West Third Street, Ferdinand, Indiana 47532
County:	Dubois
SIC Code:	2434
Operation Permit No.:	T037-5930-00051
Permit Reviewer:	ERG/TDP

On November 14, 2003, the Office of Air Quality (OAQ) had a notice published in The Herald, Jasper, Indiana, stating that MasterBrand Cabinets, Inc. had applied for a Part 70 Operating Permit to operate a woodworking and surface coating operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 11, 2003, MasterBrand Cabinets, Inc. submitted comments on the proposed Part 70 Operating Permit. The summary of the comments and IDEM, OAQ responses is as follows. Text with a line through it has been deleted and bold text has been added. The Table of Contents has been updated as necessary.

Comment 1: We request that the contact be changed from Mr. Charles Vollmer to Mr. Willard Robertson, Environmental Manager. All future correspondence should be directed to the attention of Mr. Robertson at One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546.

Response to Comment 1: The IDEM database has been updated to reflect the change in the contact.

Comment 2: Section A.1, and page 14 of 20 of the TSD erroneously state that the facility manufactures home entertainment centers. Operations at the source consist of a stationary woodworking and surface coating operation manufacturing kitchen and bath cabinets. Please remove all references to home entertainment centers.

Response to Comment 2: No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. All references to home entertainment centers have been removed from the permit. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Section A.1 has been changed to read as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary woodworking and surface coating operation manufacturing kitchen and bath cabinets ~~and home entertainment centers~~.

Comment 3: Section A.3(a)(4), item (a)(4) in Section D.1, and item (a)(4) on page 2 of 20 of the TSD erroneously refer to stacks TC3 and TC4. The top coat booth identified as TCB-15 exhausts through stacks TC4 and TC5. Please remove references to stack TC3 in relation to top coat booth TCB-15.

Response to Comment 3: No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Section A.3(a)(4) and the facility description in Section D.1 have been updated as follows:

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

. . . .

(4) One (1) top coat booth, identified as TCB-15, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks TC~~3~~**4** and TC~~4~~**5** and

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Conventional Surface Coating Line and Electrostatic Finishing Line

(a) One (1) conventional surface coating line, constructed in 1973, comprised of the following surface coating facilities:

(1) One (1) toner booth, identified as TB-12, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack T4;

(2) One (1) stain booth, identified as STB-13, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack ST4;

(3) One (1) sealer booth, identified as SB-14, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks S3 and S4;

(4) One (1) top coat booth, identified as TCB-15, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks TC~~3~~**4** and TC~~4~~**5**;

Comment 4: Section A.3(b)(8), item (b)(8) in Section D.1, and item (b)(8) on page 2 of 20 of the TSD erroneously describe the natural gas-fired oven identified as Ou-5. This oven is located on the conventional line and not the electrostatic line and should be added as item (a)(6) of this section. Additionally, this oven exhausts through stack O1, not 01.

Response to Comment 4: No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Section A.3 and D.1 has been changed to read as follows:

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

. . . .

(6) One (1) natural gas-fired oven identified as Ou-5, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack O1.

(b) One (1) electrostatic finishing line, comprised of the following facilities:

~~(8) One (1) natural gas-fired oven identified as Ou-5, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack 01.~~

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Conventional Surface Coating Line and Electrostatic Finishing Line

(a) One (1) conventional surface coating line, constructed in 1973, comprised of the following surface coating facilities:

. . . . .

(6) One (1) natural gas-fired oven identified as Ou-5, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack O1.

(b) One (1) electrostatic finishing line, comprised of the following facilities:

. . . .

~~(8) One (1) natural gas-fired oven identified as Ou-5, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack 01.~~

Comment 5: Section A.4(c)(1) and item (c)(1) on page 4 of 20 erroneously states that Oven Ou23 exhausts through stack 04. This should be changed to state that the oven exhausts through stack O4.

Response to Comment 5: The typographical error in Section A.4(c)(1) and in Section D.1 has been updated from stack 04 to stack O4.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):

. . . .

(c) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) natural gas-fired oven, identified as Ou23, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting at stack ~~0~~**O**4. [326 IAC 6-1-2].

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Conventional Surface Coating Line and Electrostatic Finishing Line

(a) One (1) conventional surface coating line, constructed in 1973, comprised of the following surface coating facilities:

. . . .

(i) One (1) natural gas-fired oven, identified as Ou23, with a maximum heat input capacity of 1 MMBtu units per hour, and exhausting at stack ~~0~~**O**4.

Comment 6: Section A.4(a): We do not utilize equipment for brazing, cutting, and/or soldering for production purposes. These equipment are strictly used for maintenance purposes and not for manufacturing. Therefore, these activities should be considered trivial, pursuant to 326 IAC 2-7-1(40)(E).

Response to Comment 6: IDEM, OAQ agrees. Section A.4(a) and Section D.2 have been changed as follows:

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):

~~(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-1-2].~~

(**a**~~b~~) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(**b**~~c~~) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) natural gas-fired oven, identified as Ou23, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting at stack 04. [326 IAC 6-1-2]

(2) One (1) topcoat storage tank with a capacity of 3,000 gallons; and

(3) One (1) sealer storage tank with a capacity of 3,000 gallons.

(**c**~~c~~) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.

(**d**~~e~~) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(**e**~~f~~) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(**f**~~g~~) Two (2) spray booths, identified as STB-19 and STB-20, each constructed in 2003, each with particulate emissions controlled by a dry filter, and exhausting through stacks ST5 and ST6. [326 IAC 6-1-2]

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Conventional Surface Coating Line and Electrostatic Finishing Line

Facility Description [326 IAC 2-7-5(15)]:

(a) Woodworking equipment controlled by baghouses including:
. . . .

Insignificant Activities:

~~(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, welding torches, soldering equipment, welding equipment [326 IAC 6-1-2]~~

(~~b~~**a**) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
. . . .

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.2.2 Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from the woodworking operations (MC-1, MC-2, MC-3, MC-4, MC-5, MC-6, and MC-7), ~~brazing, cutting, soldering, and welding~~ shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Comment 7: Conditions C.6, D.1.10, and D.2.4: Condition C.6 requires all air pollution control equipment listed in the permit and used to comply with applicable requirements to be in operation at all times the

emission units vented to the control equipment are in operation. Condition D.1.10 requires the dry filters to be in operation at all times the spray booths are in operation and Condition D.2.4 requires that the baghouses be in operation at all times that the woodworking facilities are in operation. These three conditions are redundant and could lead to multiple violations of the same event. We request that either C.6 be removed or that both D.1.10 and D.2.4 be removed from the permit.

Response to Comment 7: IDEM, OAQ agrees and has removed Condition C.6 from the permit. Section C has been modified as follows:

~~C.6 Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

C.**6**~~7~~ Stack Height [326 IAC 1-7]

C.**7**~~8~~ Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

C.**8**~~9~~ Performance Testing [326 IAC 3-6]

C.**9**~~10~~ Compliance Requirements [326 IAC 2-1.1-11]

C.**10**~~11~~ Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

C.**11**~~12~~ Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

C.**12**~~13~~ Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

C.**13**~~14~~ Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.**14**~~15~~ Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

C.**15**~~16~~ Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

C.**16**~~17~~ Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

C.**17**~~18~~ Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

C.**18**~~19~~ General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

C.**19**~~20~~ General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

C.**20**~~21~~ Compliance with 40 CFR 82 and 326 IAC 22-1

Comment 8: Condition C.11, Compliance Monitoring: This condition requires that all monitoring and record keeping be implemented within 60 days. The IDEM typically allows 90 days for implementation of

such requirements as demonstrated in other recently issued permits. Therefore, we request that this condition be changed to allow 90 days for implementation.

Response to Comment 8: The 60 days the Permittee refers to is the time required to begin any new monitoring required by this permit. The source is an existing operation, the control equipment is already in place, and most of the monitoring requirements were also required by previous permits, except for some paint booths in the conventional line. Therefore, the Permittee should have already implemented these monitoring requirements. Because new monitoring conditions are required for the conventional line, the time frame to implement the new requirements shall be ninety (90) days. Condition C.10 (previously C.11) has been changed as follows:

C.**10**~~11~~ Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ~~sixty (60)~~ **ninety (90)** days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ~~sixty (60)~~ **ninety (90)** days, the Permittee may extend the compliance schedule related to the equipment for an additional ~~sixty (60)~~ **ninety (90)** days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ~~sixty (60)~~ **ninety (90)** day**s** compliance schedule, with full justification of the reasons for the inability to meet this date.

Comment 9: Condition C.14, Emergency Reduction Plans: This condition states that the Permittee shall prepare a written Emergency Reduction Plan and submit it to IDEM. However, an ERP has been submitted and approved, as shown on Page 11 of 20 of the TSD. We request that Condition C.14 be revised to reflect that the ERP has been approved.

Response to Comment 9: Condition C.13 (previously C.14) has been changed to read as follows:

C.**13**~~14~~ Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on March 12, 1999.

(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

~~(b) These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management~~
~~Compliance Branch, Office of Air Quality~~
~~100 North Senate Avenue, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~within ninety (90) days after the date of issuance of this permit.~~

~~The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~

~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~

~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~

~~(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.~~
~~[326 IAC 1-5-3]~~

Comment 10: Condition D.1.5(a)(1), Transition Period: This condition erroneously cites the date of January 31, 2003 as being the end of the first quarter of the compliance period after commencement of the RTO. This date should be changed to January 31, 2004.

Response to Comment 10: The typographical error in Condition D.1.5(a)(1) has been corrected from January 31, 2003 to January 31, 2004.

Comment 11: Condition D.1.16(a) Reporting Requirements: Item (a) of Condition D.1.16 requires monthly status reports to be submitted until the end of the month after commencement of operation of the RTO. The RTO was installed in September and October 2003 and commencement began October 31, 2003. Therefore, status reports were only required through November 2003. We request that this condition be removed from the permit since the reports are no longer required.

Response to Comment 11: IDEM, OAQ agrees with this request. Condition D.1.16 has been changed to read as follows:

D.1.16 Reporting Requirements

~~(a) Pursuant to SSM037-13893-00051, issued February 3, 2003, the Permittee shall submit monthly reports from the date of effectiveness of SSM037-13893-00051, issued February 3, 2003, until the end of the month after commencement of operation of the RTO about the status and progress of the RTO installation. These reports shall be submitted to the address listed in Section C - General Reporting Requirements of this permit and does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

(~~b~~**a**) A quarterly summary of the information to document compliance with Conditions D.1.4 and D.1.5 shall be submitted to the address listed in Section C - General Reporting

Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(~~c~~**b**) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.2 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

(1) For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(2) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(~~d~~**c**) ~~For use of the~~**If the** RTO **is used** to ~~comply~~**demonstrate compliance** with 40 CFR 63, Subpart JJ, the excess emissions and continuous monitoring system performance report and summary report shall be submitted as required in 40 CFR 63.807(d)**. This report is not necessary if the RTO is not used to demonstrate compliance.**

(~~e~~**d**) The reports required in (~~c~~**b**) and (~~d~~**c**) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air ~~Management~~ **Quality**
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Comment 12: Condition D.1.16(d) Reporting Requirements: We do not believe that Item (d) of this condition is clear that the reporting requirements apply only if compliance with 40 CFR 63 Subpart JJ is demonstrated by use of the RTO. We request that the condition be amended to add that this report is not necessary if the RTO is not used to demonstrate compliance.

Response to Comment 12: IDEM, OAQ agrees with this request. Condition D.1.16(d) has been changed to read as follows:

D.1.16 Reporting Requirements

. . . .

(~~d~~**c**) ~~For use of the~~**If the** RTO **is used** to ~~comply~~**demonstrate compliance** with 40 CFR 63, Subpart JJ, the excess emissions and continuous monitoring system performance report and summary report shall be submitted as required in 40 CFR 63.807(d)**. This report is not necessary if the RTO is not used to demonstrate compliance.**

. . . .

Comment 13: Section D.2 and Condition D.2.2: Since the brazing equipment, welding torches, soldering equipment and/or welding equipment is for maintenance purposes (as described above) and is a trivial activity, it should be removed from the description section in D.2 and Condition D.2.2.

Response to Comment 13: IDEM, OAQ agrees. Section D.2 and Condition D.2.2 have been changed as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Woodworking equipment controlled by baghouses including:
. . . .

Insignificant Activities:

~~(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, welding torches, soldering equipment, welding equipment [326 IAC 6-1-2]~~

(~~b~~**a**) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.2.2 Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from the woodworking operations (MC-1, MC-2, MC-3, MC-4, MC-5, MC-6, and MC-7), ~~brazing, cutting, soldering, and welding~~ shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Comment 14: Condition D.2.3, Preventive Maintenance Plan: We would request that this condition be amended to read as follows: "A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit is required for the particulate control devices used for these emission units." We believe that this language is more appropriate as it does not suggest that a preventive maintenance plan is required for the individual emission units themselves.

Response to Comment 14: IDEM evaluates the scope of Preventive Maintenance Plans (PMP) requirement on a case by case basis. In this case IDEM has determined that the PMP shall cover the control devices (i.e. baghouses) used to control particulate matter emissions from the individual emission unit (i.e. woodworking cells). Condition D.2.3 has been changed as follows:

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the baghouses controlling woodworking cells** MC-2, MC-3, MC-5, MC-6, and MC-7 ~~and any control devices~~.

Comment 15: Conditions D.2.4, D.2.5, D.2.6 and D.2.7, Compliance Requirements: These conditions should not apply to the baghouses controlling woodworking cells MC-1 and MC-4. The allowable emissions from these cells is less than 10 lbs/hour based on the flow rate and grain loading limit of 0.03 gr/dscf. As such, it is our understanding that it is IDEM's policy not to require monitoring for these small emission units.

Response to Comment 15: Under permit limitations, the allowable particulate emissions from MC-1 and MC-4 are 8.5 and 9.0 lb/hr, respectively. IDEM, OAQ agrees that the compliance determination and compliance monitoring requirements D.2.4, D.2.5, and D.2.6 need not apply to woodworking operations with such low emissions allowables. However, Condition D.2.7, Broken or Failed Bag Detection, shall apply at all times for all woodworking operations. Therefore, Conditions D.2.4, D.2.5, and D.2.6 have been changed as follows:

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

In order to comply with Conditions D.2.1 and D.2.2, the baghouses for PM and PM10 control shall be in operation and control emissions from the woodworking facilities **(MC-3, MC-5, MC-6, and MC-7)** at all times that the woodworking facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation **(MC-3, MC-5, MC-6, and MC-7)** when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be repaired or replaced.

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust **(MC-3, MC-5, MC-6, and MC-7)** shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Comment 16: We request that the Part 70 Quarterly Report found on Page 43 of 49 of the draft permit be removed. This report is only required from the transitional period from February 3, 2003 to the date of commencement of operation of the RTO. The RTO began operation October 31, 2003 and therefore, this form is no longer required.

Response to Comment 16: IDEM, OAQ agrees with this request. The permit has been changed as follows:

~~**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**~~
~~**OFFICE OF AIR QUALITY**~~
~~**COMPLIANCE DATA SECTION**~~

~~**Part 70 Quarterly Report**~~

~~Source Name: MasterBrand Cabinets, Inc. - Ferdinand Operations~~
~~Source Address: 614 West Third Street, Ferdinand, Indiana 47532~~
~~Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546~~
~~Part 70 Permit No.: T037-5930-00051~~
~~Facility: Electrostatic Finishing Line~~
~~Parameter: VOC usage for stain (STB-3, STB-4), sealer (SB-7, SB-8), topcoat (TCB-9, TCB-10)*~~
~~Limit: Less than 31.75 tons per month for the stain (STB-3, STB-4), sealer (SB-7, SB-8), and topcoat (TCB-9, TCB-10) booths~~

~~YEAR: _____~~

~~Month~~	~~Column 1~~	~~Column 2~~	~~Column 1 + Column 2~~
	~~This Month~~	~~Previous 11 Months~~	~~12 Month Total~~
~~Month 1~~			
~~Month 2~~			
~~Month 3~~			

~~***Records reflecting limits for the transitional period from February 3, 2003 to the date of commencement of operation of the RTO**~~.

~~? No deviation occurred in this quarter.~~

~~? Deviation/s occurred in this quarter.~~
~~Deviation has been reported on: _____~~

~~Submitted by: _____~~
~~Title / Position: _____~~
~~Signature: _____~~
~~Date: _____~~
~~Phone: _____~~

~~Attach a signed certification to complete this report.~~

Comment 17: The Potential to Emit for PM and PM10 found on page 6 of 20 of the Technical Support Document is significantly overstated and furthermore, IDEM assumes that the PM10 and PM emissions are equal. In reality, the PM10 emissions would only be a small fraction of the total PM. IDEM calculated the PTE based on the grain loading and efficiency of the baghouse. This implies that the woodworking operations are operating continuously at maximum capacity. This is not true. Due to physical and operational constraints of the woodworking operations, the baghouses cannot continuously operate at maximum capacity.

Response to Comment 17: IDEM, OAQ agrees that the PM10 emissions are likely to be less than PM emissions. However, no data has been provided in order to determine the fraction of PM10. IDEM, OAQ uses conservative emission calculations to represent the potential to emit of equipment. The potential to emit represents the worst case emissions at maximum operation for every hour of the year. No changes have been made.

Comment 18: The source submitted additional comments on November 15, 2003, in which the source requested that the UV Vacuum Coater (UVC-26), UV Coating Line (UVC-27), End Coat Booths (ECB-1, ECB-2, ECB-3), UV Stickline (UVC-29), UV Flatline (UVC-30), and UV Stickline (UVC-31) be considered insignificant activities. The source supplied supporting emission calculations which are shown below:

Unit	Description	Material	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Density (lbs/gal)	Weight % VOC	VOC (lb/hr)	VOC (tons/yr)
UVC26	UV Vacuum	Vacuum Coat UV	0.0100	300	7.80	0.23	0.05	0.24
ECB-1	End Coat	Product LKB0057	0.0001	50	8.53	70.05	0.03	0.13

Unit	Description	Material	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Density (lbs/gal)	Weight % VOC	VOC (lb/hr)	VOC (tons/yr)
ECB-2	End Coat	Product LKB0057	0.0001	50	8.53	70.05	0.03	0.13
ECB-3	End Coat	Product LKB0057	0.0001	50	8.53	70.05	0.03	0.13
UVC29	UV Stickline	UV Clear	0.0018	143	9.33	0.13	0.003	0.01
UVC30	UV Flatline	UV Clear	0.0018	143	9.33	0.13	0.003	0.01
UVC31	UV Stickline	UV Clear	0.0018	143	9.33	0.13	0.003	0.01

Response to Comment 18: Upon further review, IDEM, OAQ has determined that the UV Vacuum Coater (UVC-26), UV Coating Line (UVC-27), End Coat Booths (ECB-1, ECB-2, ECB-3), UV Stickline (UVC-29), UV Flatline (UVC-30), and UV Stickline (UVC-31) are considered insignificant activities, based on emission estimates submitted by the source on November 15, 2003. The actual VOC emissions from each facility is less than 15 lb/day and therefore 326 IAC 8-2-12 (VOC) does not apply. Section A.3, Section A.4, Condition D.1 and Condition D.1.7 have been modified as follows:

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

. . . .

(d) Woodworking equipment controlled by baghouses including:

(1) One (1) woodworking cell, identified as MC-1, constructed in 1968, controlled by a 33,000 cubic feet per minute baghouse, and exhausting either internally or to stacks MU1, MU2, MU3, MU4, MU5, and MU6; and

(2) One (1) woodworking cell, identified as MC-4, constructed in 1968, controlled by a 35,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-3.

~~(e) Three (3) end coat booths, identified as ECB-1, ECB-2, and ECB-3, each constructed in 1994, each with particulate emissions controlled by a dry filter, and exhausting through stacks EC1, EC2, and EC3, respectively [326 IAC 6-1-2].~~

~~(f) One (1) UV Stickline, identified as UVC-31, constructed in 1999, and exhausting internally;~~

~~(g) One (1) UV Flatline, identified as UVC-30, constructed in 1994, and exhausting internally;~~

~~(h) One (1) UV Stickline, identified as UVC-29, constructed in 1994, and exhausting internally;~~

~~(i) One (1) UV-cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-26, constructed in 1994, exhausting to stack UV6/7;~~

~~(j) One (1) UV coating line, identified as UVC27 and constructed in 2003, with a maximum operating capacity of 2,170 square feet per hour, using a UV spray coating application method.~~

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):

~~(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-1-2].~~

(~~b~~**a**) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(~~c~~**b**) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) natural gas-fired oven, identified as Ou23, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting at stack O4. [326 IAC 6-1-2]

(2) One (1) topcoat storage tank with a capacity of 3,000 gallons; and

(3) One (1) sealer storage tank with a capacity of 3,000 gallons.

(~~d~~**c**) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.

(~~e~~**d**) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(~~f~~**e**) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(~~g~~**f**) Two (2) spray booths, identified as STB-19 and STB-20, each constructed in 2003, each with particulate emissions controlled by a dry filter, and exhausting through stacks ST5 and ST6. [326 IAC 6-1-2]

(g) Three (3) end coat booths, identified as ECB-1, ECB-2, and ECB-3, each constructed in 1994, each with particulate emissions controlled by a dry filter, and exhausting through stacks EC1, EC2, and EC3, respectively [326 IAC 6-1-2].

(h) One (1) UV Stickline, identified as UVC-31, constructed in 1999, and exhausting internally;

(i) One (1) UV Flatline, identified as UVC-30, constructed in 1994, and exhausting internally;

(j) One (1) UV Stickline, identified as UVC-29, constructed in 1994, and exhausting internally;

(k) One (1) UV cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-26, constructed in 1994, exhausting to stack UV6/7;

(l) One (1) UV coating line, identified as UVC27 and constructed in 2003, with a maximum operating capacity of 2,170 square feet per hour, using a UV spray coating application method.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Conventional Surface Coating Line and Electrostatic Finishing Line

(a) One (1) conventional surface coating line, constructed in 1973, comprised of the following surface coating facilities:

. . . .

(6) One (1) natural gas-fired oven identified as Ou-5, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack O1.

(b) One (1) electrostatic finishing line, comprised of the following facilities:

. . . .

~~(8) One (1) natural gas-fired oven identified as Ou-5, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack 01.~~

~~(c) Three (3) end coat booths, identified as ECB-1, ECB-2, and ECB-3, each constructed in 1994, each with particulate emissions controlled by a dry filter, and exhausting through stacks EC1, EC2, and EC3, respectively [326 IAC 6-1-2].~~

~~(d) One (1) UV Stickline, identified as UVC-31, constructed in 1999, and exhausting internally;~~

~~(e) One (1) UV Flatline, identified as UVC-30, constructed in 1994, and exhausting internally;~~

~~(f) One (1) UV Stickline, identified as UVC-29, constructed in 1994, and exhausting internally;~~

~~(g) One (1) UV cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-26, constructed in 1994, exhausting to stack UV6/7;~~

~~(h) One (1) UV coating line, identified as UVC27 and constructed in 2003, with a maximum operating capacity of 2,170 square feet per hour, using a UV spray coating application method.~~

(~~i~~**c**) One (1) natural gas-fired oven, identified as Ou23, with a maximum heat input capacity of 1 MMBtu units per hour, and exhausting at stack ~~0~~**O**4.

Insignificant Activities:

(~~j~~**d**) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) topcoat storage tank with a capacity of 3,000 gallons; and

(2) One (1) sealer storage tank with a capacity of 3,000 gallons.

Insignificant Activities: (Continued)

(~~k~~**e**) Two (2) spray booths, identified as STB-19 and STB-20, each constructed in 2003, each with particulate emissions controlled by a dry filter, and exhausting through stacks ST5 and ST6. [326 IAC 6-1-2]

(f) Three (3) end coat booths, identified as ECB-1, ECB-2, and ECB-3, each constructed in 1994, each with particulate emissions controlled by a dry filter, and exhausting through stacks EC1, EC2, and EC3, respectively.

(g) One (1) UV Stickline, identified as UVC-31, constructed in 1999, and exhausting internally;

(h) One (1) UV Flatline, identified as UVC-30, constructed in 1994, and exhausting internally;

(i) One (1) UV Stickline, identified as UVC-29, constructed in 1994, and exhausting internally;

(j) One (1) UV cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-26, constructed in 1994, exhausting to stack UV6/7;

(k) One (1) UV coating line, identified as UVC27 and constructed in 2003, with a maximum operating capacity of 2,170 square feet per hour, using a UV spray coating application method.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to SSM 037-13893-00051 and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets by the electrostatic finishing line (TB-2, STB-3, STB-4, SB-7, SB-8, TCB-9, TCB-10, SB-6, and TCB-18)~~, the UV Sticklines (UVC-31 and UVC-29), the UV Flatline (UVC-30), the UV cured vacuum coater (UVC-26), and the three end coat booths (ECB-1, ECB-2, and ECB-3)~~ shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Upon further review, IDEM, OAQ made the following changes to the permit. Text with a line through it has been deleted and bold text has been added. The Table of Contents was updated as necessary.

1. The name Compliance Branch was changed to Compliance Data Section in Condition B.14 and Condition C.20. The name source was changed to Permittee in Conditions C.9, C.15 and C.20.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.**19**~~20~~ General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

C.~~8~~**9** Performance Testing [326 IAC 3-6]

. . . .

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

C.**14**~~15~~ Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the ~~source~~ **Permittee** must comply with the applicable requirements of 40 CFR 68.

2. For clarification, an additional rule citation has been added to Condition B.21.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] **[IC13-17-3-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

3. Condition C.7 Stack Height has been revised to correct the rule cite.

C.~~6~~**7** Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC **1-7-1(3),** 1-7-2, ~~326~~ IAC 1-7-3(c) and (d), 326 IAC 1-7-4**, and 1-7-5**(~~d~~**a**), (~~e~~**b**), and ~~(f), and 326 IAC 1-7-5~~(d) are not federally enforceable.

4. The notification requirement in C.16 has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. This provides OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements. Condition C.16 has been revised as follows:

C.**15**~~16~~ Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

. . .

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

. . . .

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ~~10~~ **ten (10)** days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. **The notification shall also include** the status of the applicable compliance monitoring parameter with respect to normal, and the results of the **response** actions taken up to the time of notification.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Location:	614 West Third Street, Ferdinand, Indiana 47532
County:	Dubois
SIC Code:	2434
Operation Permit No.:	T037-5930-00051
Permit Reviewer:	ERG/TDP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from MasterBrand Cabinets, Inc. - Ferdinand Operations relating to the operation of a woodworking and surface coating operation manufacturing kitchen and bath cabinets and home entertainment centers.

Source Definition

This woodworking and surface coating company consists of two (2) plants:

(a) Plant 4 is located at 614 West Third Street, Ferdinand, Indiana 47532; and

(b) Plant 22 is located at 624 West Third Street, Ferdinand, Indiana 47532.

Since the two (2) plants are located on contiguous and adjacent properties, have the same SIC codes, and are under common ownership and control, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) conventional surface coating line, constructed in 1973, comprised of the following surface coating facilities:

(1) One (1) toner booth, identified as TB-12, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack T4;

(2) One (1) stain booth, identified as STB-13, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack ST4;

(3) One (1) sealer booth, identified as SB-14, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks S3 and S4;

(4) One (1) top coat booth, identified as TCB-15, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks TC3 and TC4; and

(5) Two (2) parts booths, identified as PB-16 and PB-17, with a maximum capacity of 225 units per hour, each with particulate emissions controlled by a dry filter, and exhausting through stacks P1, P2, and P3.

(b) One (1) electrostatic finishing line, comprised of the following facilities:

(1) One (1) toner spray booth, identified as TB-2, constructed in 1985, with a maximum capacity of 766 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks T1 and T2;

(2) Two (2) stain spray booths using electrostatic spray applicators, identified as STB-3 and STB-4, both constructed in 1985, each with a maximum capacity of 766 units per hour, each with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(3) Two (2) sealer spray booths using electrostatic spray applicators, identified as SB-7 and SB-8, both constructed in 1985, each with a maximum capacity of 766 units per hour, each with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(4) Two (2) topcoat spray booths using electrostatic spray applicators, identified as TCB-9 and TCB-10, both constructed in 1985, each with a maximum capacity of 766 units per hour, with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(5) One (1) sealer touchup spray booth, identified as SB-6, constructed in 1989, with particulate emissions controlled by a dry filter, and exhausting through stack S3;

(6) One (1) topcoat touchup spray booth, identified as TCB-18, constructed in 1993, with particulate emissions controlled by a dry filter, and exhausting through stack TC3; and

(7) One (1) natural gas-fired curing oven, identified as Ou-11, constructed prior to 1985, with a maximum capacity of 2 million British thermal units per hour (MMBtu/hr), and exhausting to stacks O2 and O3.

(8) One (1) natural gas-fired oven identified as Ou-5, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack 01.

(c) Woodworking equipment controlled by baghouses, including:

(1) One (1) woodworking cell, identified as MC-2, constructed in 1968, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-1;

(2) One (1) woodworking cell, identified as MC-3, constructed in 1998, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-2;

(3) One (1) woodworking cell, identified as MC-5, constructed in 1997, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-4;

(4) One (1) woodworking cell, identified as MC-6, constructed in 1986, controlled by a 61,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-5; and

(5) One (1) woodworking cell, identified as MC-7, constructed in 1986, controlled by a 48,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-6.

(d) Woodworking equipment controlled by baghouses including:

(1) One (1) woodworking cell, identified as MC-1, constructed in 1968, controlled by a 33,000 cubic feet per minute baghouse, and exhausting either internally or to stacks MU1, MU2, MU3, MU4, MU5, and MU6; and

(2) One (1) woodworking cell, identified as MC-4, constructed in 1968, controlled by a 35,000 cubic feet per minute baghouse, and exhausting either internally or to stack T-3.

(e) Three (3) end coat booths, identified as ECB-1, ECB-2, and ECB-3, each constructed in 1994, each with particulate emissions controlled by a dry filter, and exhausting through stacks EC1, EC2, and EC3, respectively.

(f) One (1) UV Stickline, identified as UVC-31, constructed in 1999, and exhausting internally;

(g) One (1) UV Flatline, identified as UVC-30, constructed in 1994, and exhausting internally;

(h) One (1) UV Stickline, identified as UVC-29, constructed in 1994, and exhausting internally;

(i) One (1) UV cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-26, constructed in 1994, exhausting to stack UV6/7;

(j) One (1) UV coating line, identified as UVC27 and constructed in 2003, with a maximum operating capacity of 2,170 square feet per hour, using a UV spray coating application method.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units and pollution control equipment receiving advanced source modification approval at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2]

(b) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(c) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) natural gas-fired oven, identified as Ou23, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting at stack 04. [326 IAC 6-1-2]

(2) One (1) topcoat storage tank with a capacity of 3,000 gallons; and

(3) One (1) sealer storage tank with a capacity of 3,000 gallons.

(d) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(g) Two (2) spray booths, identified as STB-19 and STB-20, each constructed in 2003, each with a maximum capacity of 220 units per hour, each with particulate emissions controlled by a dry filter, and exhausting through stacks ST5 and ST6. [326 IAC 6-1-2]

Existing Approvals

The source has been constructed and has been operating under the following previous approvals:

(a) Exemption, issued on April 16, 2003;

(b) SSM037-13893-00051, issued on February 3, 2003;

(c) CP037-9634-00051, issued May 15, 1998;

(d) E037-7285-00051, issued December 30, 1996;

(e) E037-3736-00051, issued August 3, 1994;

(f) E037-3742-00051, issued June 7, 1994;

(g) E037-3229-00051, issued February 18, 1994;

(h) R037-3293-00051, issued December 16, 1993;

(i) CP037-2589-00051, issued June 30, 1993;

(j) Exemption, issued February 1, 1990;

(k) Exemption, issued January 25, 1989; and

(l) Exemption, issued March 20, 1986.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.
The following terms and conditions from previous approvals have been revised by this Part 70 permit:

(a) Condition D.1.6 (Particulate Emission Limitations, Work Practices, Control Technologies [326 IAC 6-3]) of SSM037-13893-00051, issued February 3, 2003

Reason for the Revision: 326 IAC 6-3 does not apply to the electrostatic finishing line because 326 IAC 6-1-2 applies. 326 IAC 6-1-2 applies because the source is located in Dubois County which is listed in 326 IAC 6-1-7 (Scope), the source is not specifically listed in 326 IAC 6-1-9 (Dubois County), it has the potential to emit one hundred (100) tons per year of PM, and actual PM emissions exceed ten (10) tons per year. For this reason, requirements pursuant to 326 IAC 6-3 were removed and replaced with requirements pursuant to 326 IAC 6-1-2.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, they were not incorporated into this Part 70 permit:

(a) All construction conditions from all previously issued permits.

Reason Not Incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

(b) Operation Condition 5 of CP037-2589-00051, issued June 30, 1993. This condition provided a PSD minor limit for the topcoat touchup spray booth, TCB-18.

Reason Not Incorporated: TCB-18 was reviewed under PSD BACT as part of SSM037-13893-00051, issued February 3, 2003. SSM037-13893-00051, issued February 3, 2003, provided PSD BACT requirements for all facilities that are part of the electrostatic finishing line, including TCB-18. Therefore, the PSD minor limit of CP037-2589-00051, issued June 30, 1993, was lifted in SSM037-13893-00051, issued February 3, 2003.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 23, 1996.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A (pages 1 through 6) of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	58,437.04
PM-10	58,437.04
SO_2	0.03
VOC	3,012.77
CO	3.64
NO_x	4.34

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	30.41
Ethyl Benzene	0.09
Toluene	17.13
Trimethylbenzene	0.44
Benzene	Negligible
Dichlorobenzene	Negligible
Formaldehyde	Negligible
Hexane	0.08
Lead	Negligible
Cadmium	Negligible
Chromium	Negligible

Manganese	Negligible
Nickel	Negligible
Single HAP	Greater than 10
Combination HAPs	Greater than 25

Negligible indicates emissions less than 0.01 tons per year.
Note that the specific HAP emissions were not totaled to obtain the emissions of combination HAPs because HAP emissions data was not provided by the source for the electrostatic finishing line. Thus, the potential to emit HAPs from the source will actually be greater than the emissions shown here.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 and VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program).

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program).

(c) Fugitive Emissions
Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2 (Prevention of Significant Deterioration) and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	51.99
PM-10	---
SO_2	0.00
VOC	484.03
CO	0.25
NO_x	0.30
HAP	---

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit After Issuance (tons/year)						
Process/Facility	PM	PM-10	SO_2	VOC	CO	NO_X	Total HAPs
Conventional Line	3.84*	3.84	0	365.93	0	0	48.07***

Electrostatic Finishing Line	16.43*	16.43	0	319**	0	0	Greater than 10 for a single HAP; Greater than 25 for any combination of HAPs***
Combustion (Thermal Oxidizer and Curing Oven)	0.08	0.33	0.03	0.24	3.64	4.34	0.08
Woodworking	58.42****	58.42****	0	0	0	0	0
Total Emissions	78.77	79.02	0.03	685.17	3.64	4.34	Greater than 10 for a single HAP; Greater than 25 for any combination of HAPs

*These facilities are subject to a PM emission limit of 0.03 gr/dscf pursuant to 326 IAC 6-1-2.
**This limit is broken down as follows: the stain booths (STB-3, STB-4), sealer booths (SB-7, SB-8), and topcoat booths (TCB-9, TCB-10) shall use less than 200 tons of VOC per year, combined, in conjunction with the thermal oxidizer; and the toner booth (TB-2) and touchup booths (SB-6, TCB-18) shall use less than 119 tons of VOC per year, combined.
***All booths are subject to the requirements of 40 CFR 63, Subpart JJ.
****These are emissions taking into account the 326 IAC 6-1-2 limit of 0.03 gr/dscf, and PSD limits of 24.9 tons per year PM and 14.9 tons per year PM-10 on the woodworking cells MC-3, MC-5, MC-6, and MC-7.

County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Dubois County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2 (Prevention of Significant Deterioration) and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7 (Part 70 Permit Program), pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The insignificant topcoat storage tank and sealer storage tank are not subject to the requirements of 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) even though they were constructed after July 23, 1984, the applicability date of this rule, because the tanks do not have a storage capacity greater than or equal to forty (40) cubic meters.

(b) The conventional surface coating operations, electrostatic finishing line, end coat booths (ECB-1, ECB-2, ECB-3), UV Sticklines (UVC-31 and UVC-29), UV Flatlines (UVC-30), UV cured vacuum coater (UVC-26) and UV coating line (UVC-27) are subject to the requirements of 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) because the source manufactures wood furniture and it is a major source of HAPs. Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(4) The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(A) Operator training course.
(B) Leak inspection and maintenance plan.
(C) Cleaning and washoff solvent accounting system.
(D) Chemical composition of cleaning and washoff solvents.
(E) Spray booth cleaning.
(F) Storage requirements.
(G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(H) Line cleaning.
(I) Gun cleaning.
(J) Washoff operations.
(K) Formulation assessment plan for finishing operations.

(5) If the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(6) The Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits.

(A) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(B) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(C) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(D) The VHAP content in weight percent of each thinner used.

(E) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(7) The Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(8) A semi-annual Continuous Compliance Report and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

(A) For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(B) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(c) This source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring (CAM). In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and, 3) the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal or greater than 100 percent of the amount required for a source to be classifies as a major source. Additionally, the application had to be received after April 20, 1998. If the application was received prior to this date, then the source is subject to CAM upon renewal of the Part 70 Permit. The application for the Part 70 Permit was received May 23, 1996.

The booths of the conventional surface coating line and the electrostatic finishing line are not subject to CAM pursuant to 40 CFR 64.2(b)(i) because the lines are subject to the requirements of 40 CFR 63, Subpart JJ. These units are not subject to any other VOC or HAP emission limit other than VOC input limits.

The woodworking operations (MC-1 through MC-7) each have the potential to emit greater than one hundred (100) tons per year of PM, are subject to an emission limitation, and use a baghouse to comply with this limitation. Since these units meet the requirements of CAM, this source will be subject to CAM upon renewal of the Part 70 permit.

(d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source even though the source has the potential to emit greater than ten (10) tons per year of a single HAP and greater than twenty-five (25) tons per year of any combination of HAPs because the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on March 12, 1999. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not one (1) of the twenty-eight (28) listed source categories and it was constructed prior to the finalization of the PSD rules. Upon finalization of the PSD rules, the source was an existing major source because it had the potential to emit greater than two hundred fifty (250) tons per year of VOC, PM, and PM10. In 1985, 1989, and 1993, toner, stain, sealer, and topcoat booths were constructed to make up the electrostatic finishing line. In 1996, the source submitted a Part 70 Permit application. At this time, IDEM, OAQ determined that the electrostatic finishing line was not permitted and the modifications should have been reviewed under PSD. To correct this deficiency, the source was issued SSM 037-13893-00051 on February 3, 2003 which reviewed the modifications under 326 IAC 2-2.

Pursuant to 326 IAC 2-2-3 and SSM037-13893-00051, issued February 3, 2003, which reviewed the construction of the electrostatic finishing line with respect to 326 IAC 2-2, the Permittee shall comply with the following requirements:

(a) The Permittee shall operate a regenerative thermal oxidizer (RTO) to control the VOC emissions from the stain booths (STB-3 and STB-4), sealer booths (SB-7 and SB-8), and topcoat booths (TCB-9 and TCB-10). The Permittee submitted an Affidavit of Construction for the RTO on October 31, 2003 and the RTO commenced operation.

The regenerative thermal oxidizer shall operate at all times when the electrostatic finishing line is in operation to control VOC emissions, to comply with 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 63 Subpart JJ, if compliance with the 40 CFR 63 Subpart JJ is based on use of an add on control.

The regenerative thermal oxidizer shall operate with a capture efficiency of no less than fifty (50) percent and destruction efficiency of no less than ninety-five (95) percent.

(b) The input VOC shall be limited as follows:

(1) Stain Booths (STB-3 and STB-4), Sealer Booths (SB-7 and SB-8), and Topcoat Booths (TCB-9 and TCB-10)

The input of VOC shall be limited such that, in conjunction with the use of the regenerative thermal oxidizer, the VOC emissions shall not exceed two hundred (200) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) Toner Booth (TB-2) and Touchup Booths (SB-6 and TCB-18)

The input of VOC shall not exceed one hundred nineteen (119) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) During the time period from the date of commencement of operation of the RTO, October 31, 2003, up to twelve (12) months of operation, the input of VOC to the stain (STB-3 and STB-4), sealer (SB-7 and SB-8), and topcoat (TCB-9 and TCB-10) booths shall be limited, such that in conjunction with the operation of the RTO, the VOC emissions shall not exceed two hundred (200) tons per year. This limit shall be implemented as follows:

(1) For the period of the first quarter (period of three (3) calendar months) from the date of commencement of operation of the RTO, October 31, 2003, to January 31, 2003, the input of VOC to the stain (STB-3 and STB-4), sealer (SB-7 and SB-8), and topcoat (TCB-9 and TCB-10) booths shall be limited such that, in conjunction with the operation of the RTO, the VOC emissions shall not exceed fifty (50) tons per quarter.

(2) For the subsequent months up to October 31, 2004, the input of VOCs to the stain (STB-3 and STB-4), sealer (SB-7 and SB-8), and topcoat (TCB-9 and TCB-10) booths shall be limited such that, in conjunction with the operation of the RTO, the total VOC emissions divided by the accumulated months of operation from the date of commencement of operation of the RTO shall not exceed 16.67 tons per month.

In 1986, 1997, and 1998, four woodworking cells, MC-3, MC-5, MC-6, and MC-7, were constructed. Woodworking cell MC-3, constructed in 1998, MC-5, constructed in 1997, and cells MC-6 and MC-

7, both constructed in 1986, each have the potential to emit greater than 25 tons of PM and 15 tons of PM-10 per year, the PSD threshold significance levels. If this had been identified previously, the source would have taken a limit of 25 tons per year PM and 15 tons per year PM-10 for cells MC-3 and MC-5, and for MC-6 and MC-7 combined. The source uses, and has always used, control devices, including baghouses, which has resulted in actual particulate emissions that are lower than the 15 tons per year PSD threshold for PM-10. Because the actual particulate emissions have always been less than 15 tons per year, a PSD permit for the past construction is not necessary. However, a condition specifically limiting woodworking cells MC-3 and MC-5 to less than 25 tons per year of PM and 15 tons per year of PM-10 each, and cells MC-6 and MC-7 to less than 25 tons per year of PM, is necessary to make 326 IAC 2-2 not applicable. Note that a PM_{10} limit for cells MC-6 and MC-7 are not required, because these units were constructed prior to 1987 when the PM_{10} standard came into effect.

The following condition was therefore incorporated into the permit:

The particulate matter emissions from the woodworking cells shall not exceed the following pound per hour limitations:

Facility	PM limit (lb/hr)	PM-10 limit (lb/hr)
MC-3	5.68	3.40
MC-5	5.68	3.40
MC-6 and MC-7	5.68	--

These emission limitations are equivalent to 24.9 tons of PM and 14.5 tons of PM-10 per twelve (12) consecutive month period. Therefore, compliance with these limits makes 326 IAC 2-2 not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

(a) UVC-27 and UVC-31 are not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) even though they were constructed after July 27, 1997, the applicability date of the rule. UVC-27 was constructed in 2003 and UVC-31 was a single booth constructed in 1994, and neither has the potential to emit ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPs.

(b) STB-19 and STB-20 are not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) even though they were constructed after July 27, 1997, the applicability date of this rule, because they do not have the potential to emit ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPS.

(c) All other facilities at this source are not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) because they were constructed prior to July 27, 1997, the applicability date of the rule.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM10 and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as

specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations)

This source is subject to the requirements of 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations) because it is located in Dubois County which is listed in 326 IAC 6-1-7 (Scope), the source is not specifically listed in 326 IAC 6-1-9 (Dubois County), it has the potential to emit one hundred (100) tons per year of PM, and actual PM emissions exceed ten (10) tons per year. Specific limitations pursuant to 326 IAC 6-1-2 will be included in the State Rule Applicability sections for the individual facilities.

326 IAC 6-1-9 (Nonattainment Area Limitations; Dubois County)

This source is not subject to the requirements of 326 IAC 6-1-9 (Nonattainment Area Limitations; Dubois County) even though it is located in Dubois County because MasterBrand Cabinets is not specifically listed in this rule.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

This source is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because it is subject to the requirements of 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations).

326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)

This source is not subject to the requirements of 326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations) because this source does not manufacture flat wood panels. This source manufactures kitchen and bath cabinets and home entertainment centers.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) even though it was existing as of January 1, 1980 because it is not located in Lake or Marion Counties. The source is also not subject to this regulation because it was not constructed after October 7, 1974 and prior to January 1, 1980.

State Rule Applicability - Conventional Surface Coating Line - Toner Booth (TB-12), Stain Booth (STB-13), Sealer Booth (SB-14), Topcoat Booth (TCB-15), Parts Booths (PB-16 and PB-17), and Insignificant Surface Coating Operations, End Coat Booths (ECB-1, ECB-2, and ECB-3) and Spray Booths (STB-19 and STB-20)

326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations)

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from the conventional surface coating line (TB-12, STB-13, SB-14, TCB-15, PB-16, and PB-17) and the insignificant surface coating operations (ECB-1, ECB-2, ECB-

3, and STB-19, and STB-20) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The conventional surface coating line (TB-12, STB-13, SB-14, TCB-15, PB-16, and PB-17) is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) even though each booth has the potential to emit greater then twenty-five (25) tons of VOC per year because this line was constructed prior to January 1, 1980, the applicability date of this rule.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

(a) The conventional surface coating line (TB-12, STB-13, SB-14, TCB-15, PB-16, and PB-17) is not subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because these facilities were constructed in 1973 and are located in Dubois County. Dubois County is not specifically listed in the applicability section of this rule.

(b) The End Coat Booths (ECB-1, ECB-2, ECB-3) are subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because these facilities were constructed after July 1, 1990 and have actual emissions greater than fifteen (15) pounds of VOC per day. Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain

Application High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(c) The insignificant surface coating booths STB-19 and STB-20 are not subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) even though these facilities were constructed after July 1, 1990, because they do not have the potential to emit greater than fifteen (15) pounds of VOC per day.

State Rule Applicability - Electrostatic Finishing Line - Toner Booth (TB-2), Stain Booths (STB-3 and STB-4), Sealer Booths (SB-7 and SB-8), Topcoat Booths (TCB-9 and TCB-10), and Touchup Booths (SB-6 and TCB-18)

326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations)

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from the electrostatic finishing line (TB-2, STB-3, STB-4, SB-7, SB-8, TCB-9, TCB-10, SB-6, and TCB-18) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The electrostatic finishing line (TB-2, STB-3, STB-4, SB-7, SB-8, TCB-9, TCB-10, SB-6, and TCB-18) is subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because each facility in this line was constructed after January 1, 1980 and each

facility has the potential to emit greater than twenty-five (25) tons per year of VOC. Pursuant to 326 IAC 8-1-6, the construction of these units must reduce VOC emissions using the Best Available Control Technology (BACT). This requirement will be satisfied by complying with the 326 IAC 2-2-3 (BACT) requirements listed in this permit and originating from SSM037-13893-00051, issued February 3, 2003.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

(a) TB-2, STB-3, STB-4, SB-7, SB-8, TCB-9, TCB-10, and SB-6 of the electrostatic finishing line are not subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) even though they were existing as of July 1, 1990 and have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls because they are not located in Clark, Elkhart, Floyd, Lake, Marion, Porter, or St. Joseph County.

However, during the permitting process of SSM037-13893-00051, issued February 3, 2002, the Permittee agreed to implement the requirements of 326 IAC 8-2-12. Therefore, pursuant to SSM037-13893-00051 and 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

TB-2 and SB-6 use air assisted airless spray application and STB-3, STB-4, SB-7, SB-8, TCB-9, and TCB-10 use electrostatic disc application. Therefore, these facilities are in compliance with the requirements of SSM 037-13893-00031 and 326 IAC 8-2-12.

(b) TCB-18 of the electrostatic finishing line is subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because it was constructed after July 1, 1990 and has actual emissions greater than fifteen (15) pounds of VOC per day. Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used

to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

TCB-18 uses air assisted airless spray application and is therefore in compliance with the requirements of 326 IAC 8-2-12.

State Rule Applicability - Electrostatic Finishing Line - Curing Ovens (Ou5 and Ou11)

326 IAC 6-1-2 (Particulate Emission Limitations for Nonattainment Areas)

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emissions Limitations), the particulate emissions from the electrostatic finishing line curing ovens (Ou5 and Ou11)) shall not exceed three-hundreths (0.03) grain per dry standard cubic foot (dscf).

State Rule Applicability - Woodworking Operations (MC-1 through MC-7)

326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations)

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from the woodworking operations (MC-1, MC-2, MC-3, MC-4, MC-5, MC-6, and MC-7) shall not exceed three-hundreths (0.03) grain per dry standard cubic foot (dscf).

State Rule Applicability - UV Surface Coating Operations and Insignificant Spray Booths

326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emissions Limitations)

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emissions Limitations), the particulate emissions from the UV Sticklines (UVC-31 and UVC-29), the UV Flatline (UVC-30), the UV cured vacuum coater (UVC-26), the UV coating line (UVC27), and the insignificant spray booths (STB-19 and STB-20) shall not exceed three-hundreths (0.03) grain per dry standard cubic foot (dscf).

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

(a) The insignificant spray booths (STB-19 and STB-20) and the UV coating line (UVC27) are not subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) even though they were constructed in 2003 because their actual emissions are less than fifteen (15) pounds of VOC per day.

(b) The UV Sticklines (UVC-31 and UVC-29), the UV Flatline (UVC-30), and the UV cured vacuum coater (UVC-26) are subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because they were constructed after July 1, 1990 and have actual emissions greater than fifteen (15) pounds of VOC per day. Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

State Rule Applicability - Natural Gas Fired Oven

326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emissions Limitations)

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emissions Limitations), the particulate emissions from the natural-gas fired oven (Ou23) shall not exceed three-hundreths (0.03) grain per dry standard cubic foot (dscf).

State Rule Applicability - Paved and Unpaved Roads

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because this source was constructed prior to December 13, 1985 and this source does not have the potential to emit twenty-five (25) tons per year of fugitive particulate matter.

State Rule Applicability - Insignificant Brazing, Cutting, Soldering and Welding

326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations)

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations), the particulate matter emissions from the brazing, cutting, soldering, and welding shall not exceed three-hundreds (0.03) grain per dry standard cubic foot (dscf), shall not exceed three hundreths (0.03) grain pending standard cubic foot (dscf).

State Rule Applicability - Insignificant Topcoat Storage Tank and Sealer Storage Tank

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The insignificant topcoat and sealer storage tanks are not subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) because they do not store petroleum liquids.

326 IAC 8-9 (Volatile Organic Liquid Storage Tanks)

The insignificant topcoat and sealer storage tanks are not subject to the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Tanks) because they are not located in Clark, Floyd, Lake, or Porter County.

Testing Requirements

Pursuant to SSM037-13893-00051, issued February 3, 2003, within 60 days of achieving maximum production rate, but no later than 180 days after the installation of the RTO, the Permittee shall perform VOC capture and destruction efficiency testing utilizing methods as approved by the Commissioner to show compliance with the BACT requirements.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The conventional surface coating line and electrostatic finishing line has applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the conventional surface coating booth stacks and the electrostatic finishing line stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

   (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

   (c) A continuous monitoring system shall be calibrated, maintained, and operated on the RTO for measuring operating temperature when the electrostatic finishing line is in operation. The output of this system shall be recorded as continuous and hourly average readings. From the date of commencement of the RTO until the approved stack test results are available, the Permittee shall operate the RTO at or above the hourly average temperature of 1350 degrees Fahrenheit (^{o}F).

   (d) The Permittee shall determine the hourly average temperature, minimum operating temperature, and duct pressure/fan amperage for the RTO from the most recent valid stack test that demonstrates compliance with limits and efficiencies in Condition D.1.4 and D.1.9, as approved by IDEM.

(e) On and after the date the approved stack test results are available, the Permittee shall maintain:

(1) The hourly average temperature at or above the hourly average temperature as observed during the most recent compliant stack test.

(2) the continuous operating temperature at or above the minimum operating temperature as observed during the most recent compliant stack test.

(f) The duct pressure/fan amperage shall be observed at least once per day when the RTO is on operation. On and after the date of the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test.

(g) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to comply using 40 CFR 63.804(d)(3) or 63.804(e)(3), monitoring shall be conducted in accordance with 40 CFR 63, Subpart JJ.

These monitoring conditions are necessary because the fabric filters for the conventional surface coating line and electrostatic finishing line must operate properly to ensure compliance with 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations). The RTO for the electrostatic finishing line must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration), 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), 326 IAC 20, 40 CFR 63, Subpart JJ, and 326 IAC 2-7 (Part 70).

2. The woodworking operations have applicable compliance monitoring conditions as specified below:

(a) Daily visible emission notations of the woodworking stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with the Compliance Response Plan shall be considered a deviation from this permit.

(b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(c) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), 326 IAC 2-7 (Part 70), and 326 IAC 2-2 (PSD).

Conclusion

The operation of this woodworking and surface coating operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T037-5930-00051.

Appendix A: Emissions Calculations
Conventional Surface Coating Line Emissions
Company Name: MasterBrand Cabinet Company, Inc.
Address City IN Zip: 614 West Third Street, Ferdinand, IN 47532
Permit Number: 037-5930-00051
Plt ID: 037-00051
Reviewer: ERG/TDP
Date: 10/10/2003

VOC and Particulate Emissions

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	PM Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Rouge Toner	6.98	96.37%	0.000%	96.37%	0.000%	3.63%	0.00700	225.000	6.73	6.73	10.59	254.27	46.40	0.09	185.31	95%
Rouge Wiping Stain	7.33	73.67%	0.000%	73.67%	0.000%	26.33%	0.01300	225.000	5.40	5.40	15.80	379.08	69.18	1.24	20.51	95%
Conventional Self-Sealer	7.60	72.04%	0.00%	72.04%	0.00%	27.96%	0.02400	225.000	5.48	5.48	29.57	709.57	129.50	2.51	19.58	95%
White Conv. Enamel	9.01	56.71%	0.00%	56.71%	0.00%	43.29%	0.02400	225.000	5.11	5.11	27.59	662.20	120.85	4.61	11.80	95%
Total													***365.93***	***3.84***		

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of all solvents used

HAP Emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethyl Benzene	Weight % Toluene	Weight % Trimethylbenzene	Xylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Trimethylbenzene Emissions (ton/yr)
Rouge Toner	6.98	0.00700	225.000	0.00%	0.00%	1.10%	0.00%	0.00	0.00	0.53	0.00
Rouge Wiping Stain	7.33	0.01300	225.000	32.00%	0.00%	0.31%	0.47%	30.05	0.00	0.29	0.44
Conventional Self-Sealer	7.60	0.02400	225.000	0.20%	0.05%	9.07%	0.00%	0.36	0.09	16.31	0.00
White Conv. Enamel	9.01	0.02400	225.000	6.21%	1.11%	0.03%	0.00%	13.23	2.37	0.06	0.00
Total								***30.41***	***0.09***	***17.13***	***0.44***

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Electrostic Finishing Line Emissions
Company Name: MasterBrand Cabinet Company, Inc.
Address City IN Zip: 614 West Third Street, Ferdinand, IN 47532
Permit Number: 037-5930-00051
Plt ID: 037-00051
Reviewer: ERG/TDP
Date: 10/10/2003

Note: These emission calculations were taken from SSM037-13893-00051, issued February 3, 2003.

VOC and Particulate Emissions

Material	Number of Booths	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	PM Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Alpine Toner - Toner	1	7.91	90.62%	0.049%	90.57%	0.039%	0.70%	0.00700	766.000	7.17	7.16	38.41	921.94	168.25	0.87	1023.45	95%
Fawn No-Wipe - Stain	2	7.32	98.78%	0.001%	98.78%	0.001%	0.28%	0.01300	766.000	7.23	7.23	144.01	3456.12	630.74	0.39	2582.37	95%
Electrostatic Self Seal - Sealer	2	7.62	75.28%	0.00%	75.28%	0.00%	19.94%	0.02400	766.000	5.74	5.74	210.91	5061.93	923.80	15.17	28.77	95%
Electrostatic Self Seal - Topcoat	2	7.62	75.28%	0.00%	75.28%	0.00%	19.94%	0.02400	766.000	5.74	5.74	210.91	5061.93	923.80	15.17	28.77	95%
Total														***2646.60***	***16.43***		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of all solvents used

HAP Emissions

The source did not provide emission data for HAP emissions. Additionally, HAP emissions were not provided in SSM037-13893-00051, issued February 3, 2003, which permitted this units. However, SSM037-13893-00051, issued February 3, 2003, stated that emissions, from this process, of a single HAP are greater than 10 tons per year and emissions, from this process, of a combination of HAP is greater than 25 tons per year.

Appendix A: Emissions Calculations
Natural Gas Combustion - Thermal Oxidizer and Curing Oven
Company Name: MasterBrand Cabinet Company, Inc.
Address City IN Zip: 614 West Third Street, Ferdinand, IN 47532
Permit Number: 037-5930-00051
Plt ID: 037-00051
Reviewer: ERG/TDP
Date: 10/10/2003

Thermal Oxidizer Capacity:	7.9	MMBtu/hr
Curing Oven (Ou5) Capacity:	2	MMBtu/hr
Total Capacity:	9.9	MMBtu/hr

Aggregate Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
9.9	86.7

Criteria Pollutant Emissions

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.08	0.33	0.03	4.34	0.24	3.64

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

METHODOLOGY
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hap Emissions

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.106E-05	5.203E-05	3.252E-03	7.805E-02	1.474E-04

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.168E-05	4.770E-05	6.071E-05	1.648E-05	9.106E-05

METHODOLOGY
Methodology is the same as page 1.
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Woodworking Operations

Company Name: **MasterBrand Cabinet Company, Inc.**

Address City IN Zip: **614 West Third Street, Ferdinand, IN 47532**

Permit Number: **037-5930-00051**

Plt ID: **037-00051**

Reviewer: **ERG/TDP**

Date: **10/10/2003**

Operation	Air Flow (acfm)	Outlet Grain Loading (gr/ascf)	Control Efficiency (%)	Uncontrolled Particulate Emissions (ton/yr)	Controlled Particulate Emissions (ton/yr)	326 IAC 6-1-2 Limit (gr/dscf)	Limited Particulate Emissions based on 326 IAC 6-1-2 (lb/hr)	Limited Particulate Emissions based on 326 IAC 6-1-2 (ton/yr)	326 IAC 2-2 PM Limited Emissions (ton/yr)	326 IAC 2-2 PM-10 Limited Emissions (ton/yr)
MC-1	33,000	0.01	99.9%	12,389.14	12.39	0.03	8.49	37.17	--	--
MC-2	61,000	0.003	99.9%	6,870.34	6.87	0.03	15.69	68.70	--	--
MC-3	61,000	0.003	99.9%	6,870.34	6.87	0.03	15.69	68.70	24.9	14.9
MC-4	35,000	0.01	99.9%	13,140.00	13.14	0.03	9.00	39.42	--	--
MC-5	61,000	0.003	99.9%	6,870.34	6.87	0.03	15.69	68.70	24.9	14.9
MC-6	61,000	0.003	99.9%	6,870.34	6.87	0.03	15.69	68.70	24.9	14.9
MC-7	48,000	0.003	99.9%	5,406.17	5.41	0.03	12.34	54.06		
Total				58,416.69	58.42		92.57	405.46	74.7	44.7

Methodology

Uncontrolled Emissions (ton/yr) = Air Flow (acfm) * Grain Loading (gr/ascf) * 60 (min/hr) * (8760 hr/yr) / 7000 (gr/lb) / 2000 (lb/ton) / (1-Control Efficiency)

Controlled Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) * (1-Control Efficiency)

Limited Particulate Emissions based on 326 IAC 6-1-2 (lb/hr) = Air Flow (acfm) * Limit (gr/dscf) * 60 (min/hr) * (1 lb/7000 gr)

Limited Particulate Emissions based on 326 IAC 6-1-2 (ton/yr) = Air Flow (acfm) * Limit (gr/dscf) * 60 (min/hr) * (1 lb/7000 gr) * (8760 hr/yr) * (1ton/2000lbs)

Appendix A: Emission Calculations

VOC Emissions

From the UV Coater (#UVC27)

Company Name: MasterBrand Cabinet Company, Inc.

Address: 614 West Third Street, Ferdinand, IN 47532

Title V: 037-5930-00051

Reviewer: ERG/TDP

Date: 10/10/2003

Material	Density (lbs/gal)	Weight % VOC (%)	VOC Content (lbs/gal)	Maximum Throughput (ft^2/hr)	Maximum Usage (gal/ft^2)	Potential to Emit VOC (lbs/hr)	Potential to Emit VOC (lbs/day)	Potential to Emit VOC (tons/yr)
40 Sheen Spray UV T/C	9.10	1.24%	0.113	2170	0.0009	0.22	5.29	0.97
Clean-up Solvent	7.36	100%	7.360	2170	0.000017	0.27	6.52	1.19
Total							**11.81**	**2.15**

Note: There are only negligible HAPs contained in the coating and solvent used.
In addition, there are no particulate emissions from this UV vacuum coater.

METHODOLOGY

VOC Content = Density (lbs/gal) * Weight % VOC

PTE of VOC (lbs/hr) = VOC Content (lbs/gal) * Max. Throughput (ft^2/hr) * Max. Usage (gal/ft^2)

PTE of VOC (lbs/day) = VOC Content (lbs/gal) * Max. Throughput (ft^2/hr) * Max. Usage (gal/ft^2) * 24 (hrs/day)

PTE of VOC (tons/yr) = VOC Content (lbs/gal) * Max. Throughput (ft^2/hr) * Max. Usage (gal/ft^2) * 8760 (hrs/yr) * 1 tons/2000 lbs

Appendix A: Emissions Calculations
Insignificant Spray Booths STB-19 and STB-20
Company Name: MasterBrand Cabinet Company, Inc.
Address City IN Zip: 614 West Third Street, Ferdinand, IN 47532
Permit Number: 037-5930-00051
Plt ID: 037-00051
Reviewer: ERG/TDP
Date: 10/10/2003

Note: These emission calculations were taken from SSM037-13893-00051, issued February 3, 2003.

VOC and Particulate Emissions

Material	Number of Booths	Material	Gal of Mat. (gal/unit)	Maximum (unit/hour)	VOC (lbs/gal)	HAPS (lb/gal)	VOC (lb/hr)	VOC (tons/yr)	HAPs (lbs/hr)	HAP (tons/yr)
Alpine Toner - Toner	2	Stonewash Washcoat	0.00006	220	6.38	0.64	0.08	0.34	0.01	0.03
Fawn No-Wipe - Stain	2	Autumn Moulding Stain	0.00012	220	1.59	0.01	0.04	0.18	0.00	0.001
Electrostatic Self Seal - Sealer	2	Conventional Self Seal	0.00004	220	4.79	0.73	0.04	0.18	0.01	0.03
Electrostatic Self Seal - Topcoat	2	Sonwash Breakway Flr.	0.00008	220	0.03	-	0.001	0.002	-	-
Total										

METHODOLOGY
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Potential HAP Pounds per Hour = Pounds of HAP per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential HAP Tons per Year = Pounds of HAP per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)